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Case 2:10-cv-10978-PJD-MJH

UNITED STATES DISTRICT COURT
IN THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

AMERICAN UNIVERSITY OF ANTIGUA,
COLLEGE OF MEDICINE, a foreign corporation,

Plaintiff,

V

CASE No.: 2:10-cv-10978-PJD-MJH
Judge Patrick J. Duggan
Judge Michael Hluchaniuk, referral

STEVEN WOODWARD,

Defendant,

**Defense Reply to Plaintiff's Response to Defendant's Motion for Information from,
ECFMG (Docket No. 125), Request for Information from NBME (Docket No. 128)
and Request for Information from Sallie Mae (Docket No. 130)**

U.S. DIST. COURT CLERK
EAST DIST. MICH
POINT

2011 APR 28 P 3:32

FILED

Defense Reply to Plaintiff's Response to Defendant's Motion for Information from, ECFMG (Docket No. 125), Request for Information from NBME (Docket No. 128) and Request for Information from Sallie Mae (Docket No. 130)

List of Exhibits:

Exhibit 1. Court History

Exhibit 2. Docket 125, Page 1, Date Filed 3/30/11

Exhibit 3. Docket 128, Page 1, Date Filed 4/01/11

Exhibit 4. Docket 130, Page 1, Date Filed 4/05/11

The Plaintiff has given evidence that they have violated Local Rule 7.1.

The Local Rules 7.1 specifically state that a response to a non-dispositive motion must be filed within 14 days after service of the motion.

The Plaintiff has failed to act, again, causing delay in these proceedings.

The Plaintiff failed to produce a response within the allowable time by Local Court Rules, demonstrating their bad faith toward Discovery and delaying Court proceedings, harassing, annoying, and causing distress on the Defendant.

The Plaintiff filed a response on 4/27/2011, **Exhibit 1**, Line 138.

1. The Defendant's motion, Docket 125, "**Motion for Request of Information by Court Order from the Education Commission for Foreign Medical Graduates, ECFMG**" was filed on 3/30/2011, **Exhibit 2**. The Plaintiff failed to provide a response to the motion within the allotted time, approximately **28 days**, after the Defendant's motion was filed.

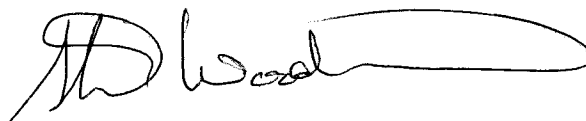
2. The Defendant's motion, Docket 128, "**Motion for Request of Information by Court Order from the National Board of Medical Examiners, NBME**" was filed 4/1/2011, **Exhibit 3**. The Plaintiff failed to provide a response to the motion within the allotted time, approximately **26 days**, after the Defendant's motion was filed.

3. The Defendant's motion, Docket 130, "**Motion for Request of Information by Court Order from Sallie Mae**" was filed 4/5/2011, Exhibit 4. The Plaintiff failed to provide a response to the motion within the allotted time, approximately **22 days**, after the Defendant's motion was filed.

The Plaintiff's obvious goal is to deny the Defendant any means of discovery, this can only prove the guilt of the Plaintiff and their lies in Docket 1 claims and the perjury of their President Neal Simon. The Plaintiff and their partners have no reason to deny or refuse the requested information other than to cover-up the truth of these lies.

The Plaintiff has failed to follow Local Rule 7.1; Docket 138 should be stricken and all of the Defendant's Motions should be Granted.

Steven Woodward
7211 Brittwood Ln
Flint, MI 48507
(810)235-7267

A handwritten signature in black ink, appearing to read 'S Woodward', with a long horizontal flourish extending to the right.

<u>109</u>	Filed & Entered:	02/16/2011	● Supplemental Brief
<u>110</u>	Filed & Entered:	02/28/2011	● Response to Motion
<u>111</u>	Filed & Entered:	02/28/2011	● Response to Motion
<u>112</u>	Filed & Entered:	03/09/2011	● Reply to Response to Motion
<u>113</u>	Filed & Entered:	03/09/2011	● Reply to Response to Motion
<u>114</u>	Filed & Entered:	03/15/2011	● Order on Motion for Miscellaneous Relief
<u>115</u>	Filed & Entered:	03/15/2011	● Order on Motion to Compel
<u>116</u>	Filed & Entered:	03/15/2011	● Order on Motion for Miscellaneous Relief
<u>117</u>	Filed & Entered:	03/17/2011	● Order on Motion to Compel
<u>118</u>	Filed: Entered: Terminated:	03/17/2011 03/18/2011 03/25/2011	● Motion to Compel
<u>119</u>	Filed & Entered:	03/18/2011	● Order Referring Motion to Magistrate Judge
<u>120</u>	Filed & Entered:	03/22/2011	● Response to Motion
<u>121</u>	Filed & Entered:	03/24/2011	● Motion to Compel
<u>122</u>	Filed & Entered:	03/24/2011	● Order Referring Motion to Magistrate Judge
<u>123</u>	Filed & Entered:	03/25/2011	● Order on Motion to Quash
<u>124</u>	Filed & Entered:	03/25/2011	● Order Requiring Responsive Pleading
<u>125</u>	Filed: Entered:	03/30/2011 03/31/2011	● Motion for Miscellaneous Relief <i>ECF MG</i>
<u>126</u>	Filed & Entered:	03/31/2011	● Order Referring Motion to Magistrate Judge

<u>127</u>	Filed & Entered:	04/01/2011	● Motion to Adjourn
<u>128</u>	Filed & Entered:	04/01/2011	● Motion for Order <i>NBME</i>
<u>129</u>	Filed & Entered:	04/01/2011	● Order Referring Motion to Magistrate Judge
<u>130</u>	Filed & Entered:	04/05/2011	● Motion for Order <i>Saltie Mae</i>
<u>131</u>	Filed & Entered:	04/06/2011	● Order Referring Motion to Magistrate Judge
<u>132</u>	Filed & Entered:	04/06/2011	● Motion for Miscellaneous Relief <i>EOS</i>
<u>133</u>	Filed & Entered:	04/06/2011	● Order Referring Motion to Magistrate Judge
<u>134</u>	Filed & Entered:	04/11/2011	● Response to Motion - <i>HSE</i> Resp Comp
<u>135</u>	Filed: Entered:	04/15/2011 04/17/2011	● Reply to Response to Motion
<u>136</u>	Filed: Entered:	04/15/2011 04/17/2011	● Motion for Sanctions
<u>137</u>	Filed & Entered:	04/18/2011	● Order Referring Motion to Magistrate Judge
<u>138</u>	Filed & Entered:	04/27/2011	● Response to Motion <i>P</i>

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UNITED STATES DISTRICT COURT
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AMERICAN UNIVERSITY OF ANTIGUA,
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Plaintiff,

V

CASE No.: 2:10-cv-10978-PJD-MJH
Judge Patrick J. Duggan
Judge Michael Hluchaniuk, referral

STEVEN WOODWARD,

Defendant,

**Motion for Request of Information by Court Order from the Education
Commission for Foreign Medical Graduates, ECFMG**

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2011 MAR 30 P 3:44

FILED

EXHIBIT 2

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Case 2:10-cv-10978-PJD-MJH

UNITED STATES DISTRICT COURT
IN THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

AMERICAN UNIVERSITY OF ANTIGUA,
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Plaintiff,

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CASE No.: 2:10-cv-10978-PJD-MJH
Judge Patrick J. Duggan
Judge Michael Hluchaniuk, referral

STEVEN WOODWARD,

Defendant,

**Motion for Request of Information by Court Order from the National Board of
Medical Examiners, NBME**

FILED

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U.S. DIST. COURT CLERK
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EXHIBIT 3

ORIGINAL

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Case 2:10-cv-10978-PJD-MJH

FILED

2011 APR -5 P 2:56

UNITED STATES DISTRICT COURT
IN THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

U.S. DIST. COURT CLERK
EAST DIST. MICH
FLINT

AMERICAN UNIVERSITY OF ANTIGUA,
COLLEGE OF MEDICINE, a foreign corporation,

Plaintiff,

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CASE No.: 2:10-cv-10978-PJD-MJH
Judge Patrick J. Duggan
Judge Michael Hluchaniuk, referral

STEVEN WOODWARD,

Defendant,

Motion for Request of Information by Court Order from Sallie Mae

EXHIBIT 4